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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NATHAN GREENBERG REVOCABLE TRUST  
DATED 6/7/1973; and BARBARA E.  
GREENBERG, in her capacity as Successor Trustee  
of the Nathan Greenberg Revocable Trust Dated  
6/7/1973,

Defendants.

Adv. Pro. No. 10-04821 (SMB)

**STIPULATION FOR ENTRY OF JUDGMENT**

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff (the “Trustee”) and Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and Barbara E. Greenberg, solely in her capacity as Successor Trustee of the Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and not individually (“Defendants”) (the Trustee and Defendants are collectively referred to as the “Parties”, and individually as a “Party”), as follows:

1. The Trustee shall be entitled to immediate entry of a Consent Judgment, a copy of which is attached hereto as Exhibit 1, entered against Defendants in the amount of \$200,000.
2. Defendants confirm the amount set forth in paragraph 1 above.
3. That judgment shall be final for all purposes upon entry of judgment and each Party waives any right to appeal therefrom.
4. That Defendants, represented in this action by counsel, have read and understand the contents of this Stipulation for Entry of Judgment (this “Stipulation”).
5. That this Stipulation shall be filed immediately upon its execution.
6. This Stipulation may be signed in counterparts, all of which when taken together shall constitute the agreement of the Parties hereto. A photocopy, facsimile or email signature to this Stipulation shall be deemed as an original signature for any and all purposes.

Dated: June 28, 2016

Of Counsel:

**BAKER & HOSTETLER LLP**

811 Main Street, Suite 1100  
Houston, Texas 77002  
Attention: Dean D. Hunt  
Facsimile: (713) 751-1717

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and for the Estate of Bernard L. Madoff*

/s/ Barbara E. Greenberg  
Defendant Nathan Greenberg Revocable Trust  
dated 6/7/1973, as amended

/s/ Barbara E. Greenberg  
Defendant Barbara E. Greenberg, solely in her  
capacity as Successor Trustee of the Nathan  
Greenberg Revocable Trust dated 6/7/1973, as  
amended, and not individually

**RIEMER & BRAUNSTEIN, LLP**

By: /s/ Jeffrey D. Ganz  
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*Attorneys for Defendants Nathan Greenberg  
Revocable Trust dated 6/7/1973, as amended,  
and Barbara E. Greenberg, solely in her  
capacity as Successor Trustee of the Nathan  
Greenberg Revocable Trust dated 6/7/1973, as  
amended, and not individually*

**Exhibit 1**

**Baker & Hostetler LLP**

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*Attorneys for Irving H. Picard, Trustee  
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BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NATHAN GREENBERG REVOCABLE TRUST  
DATED 6/7/1973; and BARBARA E.  
GREENBERG, in her capacity as Successor Trustee  
of the Nathan Greenberg Revocable Trust Dated  
6/7/1973,

Defendants.

Adv. Pro. No. 10-04821 (SMB)

**CONSENT JUDGMENT**

**WHEREAS**, Irving H. Picard (the “Trustee”) is the trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. § 78aaa *et seq.*, substantively consolidated with the liquidation under chapter 7 of the Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, of the estate of Bernard L. Madoff (“Madoff”), currently pending in United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) as Case No. 08-01789 (SMB);

**WHEREAS**, the Trustee is duly qualified to serve and act on behalf of the consolidated estate of BLMIS and Madoff;

**WHEREAS**, on or about December 1, 2010, the Trustee commenced the above-captioned adversary proceeding in the Bankruptcy Court, alleging, *inter alia*, that defendants Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and Barbara E. Greenberg, solely in her capacity as Successor Trustee of the Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and not individually (“Defendants”) received avoidable transfers in an amount aggregating Two Hundred Thousand United States Dollars (\$200,000) (the “Avoidable Transfers”) in connection with BLMIS Account No. 1EM298 (the “Trustee’s Claims”);

**WHEREAS**, on or about June 28, 2016, the Trustee and Defendants entered into a Stipulation for Entry of Judgment (“Stipulation”); and

**WHEREAS**, pursuant to the terms of the Stipulation, Defendants have consented to the entry of judgment against them (the “Consent Judgment”) with respect to the Trustee’s Claims and the Avoidable Transfers.

**NOW, THEREFORE, IT IS HEREBY ORDERED AND ADJUDGED THAT:**

1. Subject to the terms of that certain Stipulation, and as set forth in the recitals above, the Consent Judgment is hereby entered in favor of the Trustee and against Defendants in the amount of \$200,000 (the "Judgment Amount").

2. The Consent Judgment is defined and limited as set forth herein and by the terms of the Stipulation.

3. The undersigned represent that the respective parties have obtained the advice of counsel and are consenting and agreeing to all of the terms of this Consent Judgment freely and voluntarily.

4. The Clerk of Court shall enter this Consent Judgment on the Docket.

**AGREED AND CONSENTED TO AS TO FORM AND SUBSTANCE:**

**RIEMER & BRAUNSTEIN, LLP**

By: /s/ Jeffrey D. Ganz

Times Square Tower  
Seven Times Square, Suite 2506  
New York, New York 10036  
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*Attorneys for Defendants Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and Barbara E. Greenberg, solely in her capacity as Successor Trustee of the Nathan Greenberg Revocable Trust dated 6/7/1973, as amended, and not individually*

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*Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff*

**SO ORDERED**

This 28<sup>th</sup> day of June, 2016

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE

**JUDGMENT IS HEREBY ENTERED** in accordance with the terms of the foregoing:

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Clerk of the Court